

Edward Griffith
(admitted *pro hac vice*)
THE GRIFFITH FIRM
45 Broadway, Suite 2200
New York, New York 10006
(646) 645-3784 (cell)
eg@thegriffithfirm.com
Attorneys for Plaintiff Edyta Gryglak

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

EDYTA GRYGLAK, formerly known as
EDYTA A. FROMKIN,

Case No.: 2:17-cv-01514-JCM-NJK

Plaintiff,

VS.

HSBC BANK USA, N.A., as trustee for
WELLS FARGO HOME EQUITY ASSET-
BACKED CERTIFICATES, Series 2006-3,
by its Attorney-in-fact WELLS FARGO
BANK, N.A.; WELLS FARGO BANK,
N.A.; and WELLS FARGO ASSET
SECURITIES CORPORATION,

Defendants.

**UNOPPOSED MOTION TO EXTEND
PLAINTIFF'S TIME TO RESPOND TO
DEFENDANTS' MOTION TO REOPEN
DISPOSITIVE MOTION DEADLINE**

(Sixth Request)

NO FURTHER EXTENSIONS WILL BE GRANTED

Plaintiff Edyta Gryglak moves under Fed. R. Civ. P. 6(b)(1)(B) and LR IA 6-1(a) to extend the current briefing schedule for Defendants' Motion to Reopen Dispositive Motion Deadline [ECF 136] (the "Motion to Reopen") to allow Plaintiff two additional weeks to prepare and file her response. If approved, this motion would extend the due date for Plaintiff's opposition from May 12, 2021 to May 19, 2021, and the due date for Defendants' reply from May 26, 2021 to June 2, 2021. Defendants HSBC Bank USA, N.A., as trustee for Wells Fargo Home Equity Asset-Backed Certificates, Series 2006-3, by its Attorney-in-fact Wells Fargo Bank, N.A., Wells Fargo Bank, N.A., and Wells Fargo Asset Securities Corporation (collectively, "Wells Fargo" and, with Ms. Gryglak, the "Parties") do not oppose this motion.

In support of this motion, Plaintiff states as follows:

1. Wells Fargo filed the Motion to Reopen on February 24, 2021.

2. The Court thereafter granted five Stipulations that extended the due date for Plaintiffs' response from March 10, 2021 to May 12, 2021. In the May 3, 2021 Order granting the fifth Stipulation, the Court indicated that no further extensions would be granted.

3. Unfortunately, a final extension of one week is necessary. The purpose of the last four extension requests was to enable Wells Fargo to produce Ms. Gryglak's mortgage statements for the last four years. Ms. Gryglak has never received any mortgage statements directly from Wells Fargo and the last statement produced in discovery before yesterday covers March 2017.

4. The Parties disagree as to the bank statements' relevance to the Motion to Reopen. Nevertheless, Wells Fargo graciously consented to the prior extensions and to this motion to enable Ms. Gryglak to review the statements prior to filing her opposition to the Motion to Reopen.

5. Ms. Gryglak's counsel, however, did not have time to review the statements and prepare the response within only one day of receiving the statements. Accordingly, Ms. Gryglak seeks a final one-week extension of the current briefing schedule, which would make the response due on Wednesday, May 19, 2021, and Wells Fargo's reply due on Wednesday, June 2, 2021.

6. Ms. Gryglak's counsel prepared this motion and intended to file it before the current due date, May 12, 2021, expired, but internet problems prevented him from filing it until several hours after the midnight deadline. Ms. Gryglak therefore moves under Rule 6(b)(1)(B).

7. A proposed Order is annexed.

CONCLUSION

The Court should extend the current briefing schedule for the Motion to Reopen by one week, setting Ms. Gryglak's response due on May 19, 2021 and Wells Fargo's reply due on June 2, 2021.

Dated: May 12, 2021

THE GRIFFITH FIRM

/s/ Edward Griffith

By: _____
Edward Griffith (*pro hac vice*)
45 Broadway, Suite 2200
New York, New York 10006
(646) 645-3784

Attorney for Plaintiff

UNITED STATE DISTRICT COURT
DISTRICT OF NEVADA

* * *

EDYTA GRYGLAK,

Plaintiff,

v.

HSBC BANK USA, N.A., et al,

Defendants.

Case No. 2:17-CV-1514 JCM (NJK)

ORDER

Presently before the court is Plaintiff's Unopposed Motion (ECF No. 147), which seeks a sixth and final extension of the briefing schedule for Defendants' Motion to Reopen Dispositive Motion Deadline (ECF No. 136) (the "Motion to Reopen") to allow Plaintiff to file her opposition papers by May 19, 2021, one week later than the current due date of May 12, 2021. Upon Plaintiff's showing of good cause for this final extension and considering that Defendants do not oppose the motion,

IT IS HEREBY ORDERED that the due date for Plaintiff to file papers in opposition to the Motion to Reopen is extended by one week, from May 12, 2021 to May 19, 2021, and the due date for Defendants to file reply papers is extended from May 26, 2021 to June 2, 2021.

IT IS HEREBY FURTHER ORDERED that **NO FURTHER EXTENSIONS SHALL BE CONSIDERED.**

IT IS SO ORDERED.

DATED May 14, 2021.

Jeanne C. Mahan
U.S. DISTRICT COURT JUDGE

1 **CERTIFICATE OF SERVICE**

2 I hereby certify that on May 13, 2021, I electronically filed the foregoing **Motion** with the
3 Clerk of Court for the U.S. District Court, District of Nevada by using the Court's CM/ECF system.
4 Participants in the case who are registered CM/ECF users will be served by the CM/ECF system.

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6 DATED this 13th day of May 2021.

7 */s/ Edward Griffith*

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EDWARD GRIFFITH, ESQ

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UNITED STATE DISTRICT COURT
DISTRICT OF NEVADA

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EDYTA GRYGLAK,

Plaintiff,

v.

HSBC BANK USA, N.A., et al,

Defendants.

Case No. 2:17-CV-1514 JCM (NJK)

ORDER

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IT IS HEREBY ORDERED that the due date for Plaintiff to file papers in opposition to the Motion to Reopen is extended by one week, from May 12, 2021 to May 19, 2021, and the due date for Defendants to file reply papers is extended from May 26, 2021 to June 2, 2021.

IT IS HEREBY FURTHER ORDERED that **NO FURTHER EXTENSIONS SHALL BE CONSIDERED.**

IT IS SO ORDERED.

DATED this ____ day of May 2021.

U.S. DISTRICT COURT JUDGE